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November 13, 2018

Via electronic submission and via FedEx

Office of Environmental Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, California 94612
Attention: Anna Smith, Food Dye Study

**RE: REQUEST FOR EXTENSION OF COMMENT PERIOD
Regarding Request for Information on the Neurologic and Neurobehavioral
Impacts of Synthetic Food Dyes (October 22, 2018)**

Dear Ms. Smith:

The International Association of Color Manufacturers (IACM) respectfully requests a 60-day extension to the comment period for the Office of Environmental Health Hazard Assessment (OEHHA) Request for Information on the Neurologic and Neurobehavioral Impacts of Synthetic Dyes issued on October 22, 2018. IACM believes the current 60-day public comment period is an insufficient amount of time for IACM and other key stakeholders to develop and provide science-based comments on the various aspects of OEHHA's Request for Information. An extension would allow adequate time to collect and provide data and information that are responsive to OEHHA's informational request.

IACM is the trade association that represents the manufacturers and end-users of coloring substances that are used in foods, including natural and synthetic colors. An essential element of IACM's mission is the safe use of color additives.

IACM looks forward to submitting information, data and comments that are responsive to OEHHA's request for information. However, a 60-day extension to the existing comment period is necessary to allow IACM an opportunity to provide robust and responsive feedback to the agency. OEHHA has requested information relating to possible exposures and neurologic and neurobehavioral impacts of the synthetic colors as a first step in its risk assessment of the potential impacts of the following synthetic colors on children: FD&C Blue No. 1 (CAS 3844-45-9); FD&C Blue No. 2 (CAS 860-22-0); FD&C Green No. 3 (CAS 2353-45-9); Orange B (CAS 53060-70-1); Citrus Red No. 2 (CAS 6358-53-8); FD&C Red N. 3 (CAS 16423-68-0); FD&C Red No. 40 (CAS 25956-17-6); FD&C Yellow No. 5 (CAS 1934-21-0); FD&C Yellow No. 6 (CAS 2783-94-0). This risk assessment as well as a risk management report have been requested by the California legislature within the amended California Senate Bill 504, originally introduced in early 2017 by California State Senator Wieckowski who championed warning labels on foods containing the above referenced synthetic colors. Since OEHHA's risk assessment will be the foundation upon which the agency will recommend any further risk management actions to the state legislature, it is imperative that OEHHA receive the most complete and scientifically accurate information available. IACM is committed to the safe use of color additives and desires

to share with OEHHA scientific data and other probative information directly relevant to this request for information. An extension in the comment period will ensure that IACM, and other interested stakeholders, can provide such data and information.

IACM respectfully requests that the comment period for OEHHA's request for information be extended 60 days from December 21, 2018 to February 19, 2019. We expect that this extension will enhance OEHHA's ability to appropriately conduct its risk assessment.

Sincerely,

A handwritten signature in cursive script that reads "Sarah A. Codrea".

Sarah Codrea
Executive Director
The International Association of Color Manufacturers